

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

EGYPT HOUSE,

Plaintiff,

v.

JOHN P. KELLEY, AS AN INDIVIDUAL AND IN HIS CAPACITY AS CHAIRMAN OF THE BOARD OF ASSESSORS, WILLIAM J. WILLIS, AS AN INDIVIDUAL AND IN HIS CAPACITY AS MEMBER OF THE BOARD OF ASSESSORS, JONATHAN LEDERMAN, AS AN INDIVIDUAL AND IN HIS CAPACITY AS MEMBER OF THE BOARD OF ASSESSORS, TODD LARAMIE, AS AN INDIVIDUAL AND IN HIS CAPACITY AS ASSISTANT ASSESSOR, KAREN D. BERTOLINO, AS AN INDIVIDUAL AND FORMER ASSISTANT ASSESSOR, MICHAEL TUMULTY, AS AN INDIVIDUAL, IN HIS CAPACITY AS ASSISTANT ASSESSOR (RET.), AND CONSULTANT TO THE TOWN OF MARBLEHEAD, DOUGLAS E. PERCY, AS AN INDIVIDUAL AND IN HIS CAPACITY AS MEMBER OF BOARD OF ASSESSORS, BOARD OF ASSESSORS, TOWN OF MARBLEHEAD, THE TOWN OF MARBLEHEAD, A MASSACHUSETTS TOWNSHIP, THATCHER W. KEZER, III, AS AN INDIVIDUAL AND IN HIS CAPACITY AS TOWN ADMINISTRATOR, LISA L. MEAD, AS AN INDIVIDUAL AND IN HER CAPACITY AS TOWN COUNSEL, ADAM J. COSTA OF MEAD, TALERMAN & COSTA, LLC, AS AN INDIVIDUAL AND IN HIS CAPACITY AS COUNSEL TO THE TOWN OF MARBLEHEAD, MATTHEW D. PROVENCHER OF MEAD, TALERMAN & COSTA, LLC, AS AN INDIVIDUAL AND IN HIS CAPACITY AS COUNSEL TO THE TOWN OF MARBLEHEAD, AND MARK J. DEFRANCISCO, AS AN INDIVIDUAL AS TO CLAIMS ARISING UNDER G.L. C. 12, § 11I AND IN HIS CAPACITY AS CHAIRMAN OF THE APPELLATE TAX BOARD (EQUITABLE RELIEF ONLY AS TO CLAIMS ARISING UNDER 42 U.S.C.S. § 1983 AND 42 U.S.C.S. § 1985),

Defendants.

C.A. No.: 1:25-cv-10597-BEM

**OPPOSITION OF DEFENDANTS ADAM COSTA, LISA MEAD, AND MATTHEW
PROVENCHER TO PLAINTIFF’S MOTION FOR CONTINUANCE**

Defendants Adam Costa, Esq., Lisa Mead, Esq., and Matthew Provencher Esq. (collectively “Town Counsel Defendants”) hereby oppose Plaintiff, Egypt House’s Motion for Continuance (the “Motion”) (Dkt. 34) on the grounds that Plaintiff fails to present good cause for the requested continuance and that the Town Counsel Defendants are prepared to proceed with the hearing as scheduled on April 29, 2025. The Town Counsel Defendants further note that Plaintiff’s counsel did not confer with counsel for the Town Counsel Defendants, nor make any apparent attempt to confer, prior to filing the Motion as required by Local Rule 7.1.

CONCLUSION

For all the foregoing reasons, Defendants Adam Costa, Esq., Lisa Mead, Esq., and Matthew Provencher Esq. respectfully request that this Court deny Plaintiff Egypt House’s Motion for Continuance. Defendants further respectfully request such other relief, at law or in equity, to which they may justly be entitled.

Respectfully submitted,

DEFENDANTS ADAM J. COSTA, LISA L. MEAD, AND
MATTHEW D. PROVENCHER,

By their Attorneys,

/s/Anne V. Kim
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Dated: April 23, 2025

*Attorneys for Defendants Adam J. Costa, Lisa L.
Mead, and Matthew D. Provencher*

CERTIFICATE OF SERVICE

I, Anne V. Kim, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that a true and correct paper copy of the foregoing will be sent those indicated as non-registered participants via first class mail, postage prepaid on April 23, 2025.

/s/ Anne V. Kim
Anne V. Kim